

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

| | |
|----------------------|--------------------------------|
| TAMARA WAREKA p/k/a/ | § |
| TAMARA WILLIAMS | § |
| Plaintiff, | § |
| | § |
| V. | § CASE NO. 1:21-cv-00382-LY-SH |
| | § |
| ANA SQUARE d/b/a ANA | § |
| SQUARE | § |
| MICROBLADING; and | § |
| DOES 1 | § |
| Though 10 inclusive, | |
| Defendants. | § |

DEFENDANT' RESPONSES TO PLAINTIFF'S
REQUEST FOR DISCLOSURE

To: Tamara Wareka p/k/a/ Tamara Williams, by and through her attorney of record, Mathew K. Higbee Higbee & Associates 1504 Brookhollow Dr. Ste 112 Santa Ana CA 92705

Defendant, Ana Square d/b/a Ana Square Microblading, serves these responses to Plaintiff's Request for Disclosures under the Federal Rules of Civil Procedure 26.

Respectfully submitted,

By: /s/ Carlos M. Quinonez
Carlos M. Quinonez
Texas Bar No. 24056172

Email: carlos@quinonezlawfirm.com
11890 Vista Del Sol Dr., Suite A-115
El Paso, Texas 79936
Tel. (915) 533-0009
Fax. (888) 301-1116
Attorney for Plaintiff Defendant

CERTIFICATE OF SERVICE

By my signature below, I certify that a true and correct copy of the foregoing document was served on counsel for the Plaintiff in the manner indicated, on October 29, 2021, as follows:

VIA EMAIL: mhigbee@higbeeassociates.com

Mathew K. Higbee Higbee & Associates 1504 Brookhollow Dr. Ste 112 Santa Ana CA 92705

Attorney for Plaintiff

RESPONSES TO REQUEST FOR DISCLOSURES

Defendant, Ana Square provides her initial disclosures to Plaintiff. These disclosures are based on Defendant's preliminary understanding of the facts as set forth in the Petition and Answer. Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

Response to request under Rule 26 1 (a) (i):

Tamara Wareka p/k/a/ Tamara Williams, Plaintiff
Mathew K. Higbee Higbee &
Associates 1504 Brookhollow
Dr. Ste 112 Santa Ana CA 92705
Attorney for Plaintiff

Ana Square d/b/a Ana Square Microblading, Defendant
c/o Carlos M. Quinonez
Texas Bar No. 24056172
Email: carlos@quinonezlawfirm.com
11890 Vista Del Sol Dr., Suite A-115
El Paso, Texas 79936
Tel. (915) 533-0009
Fax. (888) 301-1116

Jaime Square,
11890 Vista Del Sol Dr.,
El Paso, Texas 79936
Tel. (915) 533-0009
Fax. (888) 301-1116

Yaneli Campos Castillo
Edmundo Martinez Street
Col Primavera
Tampico, Tampico Mexico

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

Response to request under Rule 26 (1) (a) (ii):

Documents provided in Response to Request for Production, and any documents produced by Plaintiff and Defendant.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

Response to request under Rule 26 (1)(a) (iii):

No damages are sought at this time.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

Response to request under Rule 26 (1) (a) (iv):

There are no indemnity or insurance agreements.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.